

### III. REMARKS

Claims 1-3, 5-17, and 19-26 are pending in this application. By this Amendment, claims 1, 5, 8-14, and 21 have been amended, and claims 4 and 18 have been cancelled. Applicants are not conceding in this application that those claims are not patentable over the art cited by the Office, as the present claim amendments are only for facilitating expeditious prosecution of the subject matter. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

#### **Rejections under 35 U.S.C. § 101**

In the Office Action, claims 1-17 and 19-20 are rejected under 35 U.S.C. § 101 as being allegedly directed to non-statutory subject matter. Claims 1-13 are rejected as “not falling within one of the four statutory categories of invention” (Office Action, p. 2), and claims 14-17 and 19-20 are rejected as being drawn to a system which the Office considers to be implemented in computer program only (*id.*, p. 3).

With regard to independent claims 1 and 8, Applicants have amended these claims herein to recite the features of “a computer-implemented autonomic translation method, comprising: displaying on a display device at least one interface page generated by a translation engine; receiving, via the at least one interface page, content to be translated...” (claim 1, and similarly recited in claim 8). Applicants submit that no new subject matter is added in this amendment, as support may be found in the specification as filed in at least paragraphs [0024] and [0026]; and FIG. 1, particularly external devices 22. Applicants further submit that the newly amended

features of claims 1 and 8 more clearly tie the claimed subject matter to a statutory category, such as a particular apparatus or article of manufacture, for example, a display device. With further regard to claim 8, and dependent claims 9-13, these claims have been amended herein to recite “a computer-implemented method,” rather than “a computer-implemented business method.” No new matter is added by this clarifying amendment, as it merely involves the deletion of the word “business” from the preamble.

With regard to independent claim 14, Applicants have amended this claim herein to recite the features of “an autonomic translation system, comprising: at least one processing unit; a memory operably associated with the at least one processing unit; and a translation engine storable in memory and executable by the at least one processing unit, the translation engine comprising: a content reception system...” (claim 14, lines 1-6). Applicants submit that no new matter is added by this amendment, as support may be found in the specification as filed in at least paragraph [0023]; paragraph [0026], lines 1-3; and FIG. 1, particularly CPU 14, memory 16, and translation engine 30. Applicants further submit that the newly amended features more clearly recite hardware features, making it clear that the invention is not merely “implemented in computer program.” These hardware features, including a processing unit and a memory, are clearly physical articles of manufacture. Accordingly, Applicants submit that claim 14 as amended recites patentable subject matter under § 101.

With regard to dependent claims 2, 3, 5-7, 9-13, 15-17, and 19-20, Applicants respectfully submit that because these claims incorporate by reference all of the features of claims 1, 8, and 14, respectively, they too recite patentable subject matter for the reasons presented above. Accordingly, withdrawal of the rejections of claims 1-3, 5-17, and 19-20 under § 101 is respectfully requested.

### **Rejections under 35 U.S.C. § 112, first paragraph**

In the Office Action, claims 21-26 are rejected under 35 U.S.C. § 112, first paragraph, as allegedly failing to comply with the written description requirement, specifically with respect to the language, “computer-readable medium.” Applicants have amended claim 21 herein to recite “A computer readable storage unit storing a program product comprising instructions which, when executed, cause a computer system to translate content, the instructions comprising...” Applicants respectfully submit that these amendments find support in FIG. 1 (specifically, storage unit 24), and the specification at paragraphs [0025] and [0033]. At paragraph [0025], the specification describes storage unit 24, which “can be any system (e.g., database) capable of providing storage for information under the present invention. Such information could include, for example, content input by user 50, translation results, translation process details, etc. As such, storage unit 24 could include one or more storage devices, such as a magnetic disk drive or an optical disk drive. In another embodiment, storage unit 24 includes data distributed across, for example, a local area network (LAN)...” Paragraph [0033] further describes that “Computer program ... in the present context mean[s] any expression, in any language, code or notation, of a *set of instructions intended to cause a system having an information processing capability to perform a particular function...*” Accordingly, Applicants submit that the claimed subject matter is described in the specification in such a manner as to convey to one skilled in the art that the inventors had possession of the invention at the time the application was filed.

### **Rejections under 35 U.S.C. § 103(a)**

In the Office Action, claims 1-9, 11-12, 14-16, 19-23, and 25-26 are rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Richardson (US Pat. 7,295,363) in view of

Li (US Pat. 7,318,022); and claims 10, 13, 17, and 24 are rejected under § 103(a) as being allegedly unpatentable over Richardson, Li, and further in view of official notice.

With respect to independent claims 1, 8, 14, and 21, which the Office addresses collectively in the Office Action (Office Action, p. 5), Applicants respectfully traverse the rejections under § 103(a), and submit that the proposed combination of Richardson and Li fails to teach or suggest each and every feature of the invention claimed herein. Despite Applicants' traversal, however, Applicants have amended claims 1, 8, 14, and 21 without prejudice to provide improved clarity with regard to the claimed invention.

For example, Applicants submit that Richardson and Li neither teach nor suggest “receiving feedback from the user pertaining to the translation based on the translation process details” (claim 1, lines 12-13 (as amended), and similarly claimed in claims 8, 14, and 21). No new matter is introduced by the amendment to this feature in claim 1, as it is merely to provide improved clarity, and to harmonize the language across claims 1 (as currently amended) and claims 8, 14, and 21 (as both previously and currently presented).

In the Office Action, the Office relies on Richardson at FIG. 4, steps 404-408 to teach this feature. At step 402, the user obtains an automatic translation of a source document. The document includes noted confidence metric information that pertains either to the document in its entirety or to one or more individual portions thereof. (Richardson, col. 4, lines 49-53.) In step 404, the user selects for post-editing one or more portions having a low confidence rating. (*Id.*, lines 53-55.) These portions are *transferred* to a reliable modification source (i.e. a human translator) for correction. (*Id.*, lines 55-57.) The corrected portions are processed with the original source document *by the non-user human translator*, who uses the corrected portions and original source document to create a collection of updated and assumedly accurate translation

correspondences. (*Id.*, lines 57-60.) In step 406, the updated translation correspondences are *sent back to the user* together with the corrected, translated portions (or the corrected, translated document in its entirety). (*Id.*, lines 64-67.) In step 408, the updates are assimilated into the user's automatic machine translation system. (*Id.*, line 67 – col. 5, line 2.) Accordingly, Applicants submit that Richardson does not teach “receiving feedback from the user pertaining to the translation based on the translation process details.” Richardson's feedback comes in the form of a confidence metric, which is provided by the system, and correction of selected portions with a low confidence metric, which comes from a “reliable modification source (i.e. a human translator)” who is not the same as the user.

Applicants further submit that even if, *arguendo*, Richardson taught the “receiving feedback” feature, Richardson plainly does not teach or suggest the currently amended feature of “receiving feedback from the user ... wherein the feedback includes at least one of: selecting a subject area of the content, inputting the original content, and inputting an expected result” (claim 1, lines 12-14). No new matter is added by this amendment, as support may be found in the specification in at least paragraph [0031], lines 1-4. As discussed above, Applicants submit that Richardson does not teach receiving feedback from the user. At most, Richardson's user provides a selection of the content already indicated by a low confidence metric. It is even clearer that Richardson does not teach feedback from the user “wherein the feedback includes at least one of: selecting a subject area of the content, inputting the original content, and inputting an expected result.” The user's expected result, e.g., plays no role in Richardson's system, or Li's, which focuses instead on the probability that a translation is accurate.

Because Richardson does not teach or suggest each and every feature of claims 1, 8, 14, and 21, and because Li neither cures these deficiencies nor is alleged to by the Office, Applicants respectfully submit that claims 1, 8, 14, and 21 are patentable over the cited art.

With regard to dependent claims 2, 3, 5-7, 9-13, 15-17, 19-20, and 22-26, Applicants respectfully submit that these claims are allowable for reasons stated above relative to independent claims 1, 8, 14, and 21, as well as for their own additional claimed subject matter. With regard to claim 5, Applicants note that this claim has been amended merely to maintain proper dependency in view of the cancellation of claim 4, from which claim 5 previously depended. With further regard to claims 10, 13, 17, and 24, Applicants submit that the Official Notice taken by the Office (Office Action, p. 8) further fails to cure the defects in the Richardson and Li references discussed above. Accordingly, Applicants respectfully request that the Office withdraw the rejections under § 103(a) to claims 2, 3, 5-7, 9-13, 15-17, 19-20, and 22-26.

#### IV. CONCLUSION

In addition to the above arguments, Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter, or the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicants reserve the right to present such arguments in a later response should one be necessary.

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,

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